



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT

NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE
A STATIONARY SOURCE

Issued pursuant to Title 22a of the Connecticut General Statutes and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator: Pepperidge Farm, Incorporated

Address: 595 Westport Avenue, Norwalk, CT 06851-4482

Equipment Location: 1414 Blue Hills Avenue, Bloomfield, CT 06002

Equipment Description: Roll Line #1 with an APV Model 960 bread oven

Permit Number: 011-0094

Town/Premises Numbers: 011/0132

Permit Issue Date: 04/19/2002

Modification Date:

Expiration Date:

Gina McCarthy
Commissioner

Date

PERMIT FOR ROLL LINE #1

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PART I. PROCESS DESCRIPTION

A. General Process Description

Pepperidge Farm Incorporated manufactures a variety of products including rolls and bread from various dry raw materials and water. The bread line employs the "liquid ferment" method in which the Yeast is added to a mixture of sweeteners and nutrients and then fermented for about two hours. The mixture is then added to the dough. Following fermentation, mixed dough is processed in dividers and set in baking pans. The dough then rises in proofing boxes for up to 60 minutes before baking. After proofing, the pans of dough pass through the baking ovens to bake the roll products. The roll "tunnel oven" is rated at 6.0 MMBTU/hr and is fired by natural gas. The oven will be operated under "negative pressure" to ensure inflow at oven openings inside the bakery. The roll pans exit the oven and pass through coolers and depanning stations. The roll products are then packaged. The emissions from the bread oven exhausts to a Regenerative Thermal Oxidizer (RTO) for destruction of Volatile Organic Compound (VOC) emissions.

B. Equipment Design Specifications

Bread Oven: APV Model 960:

Fuel Type: Natural Gas

Maximum Fuel Firing Rate: 5,797 ft³/hr

Maximum hourly Bread product output: 10,200 lb/hr

Maximum hourly Roll product output: 4,500 lb/hr (*)

Maximum hours of operation: 7,500 hrs/yr

(*) The limitation on the roll product output is based on physical pan constraint in the oven.

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PART I. PROCESS DESCRIPTION, continued

C. Control Equipment Specifications

Primary Control: MEGTEC Clean Switch Model 350-95 Regenerative Thermal Oxidizer (**Oxidizer B**)

Capture Efficiency: \geq 95% of total bakery VOC emissions
Destruction Efficiency: \geq 98% of VOC emissions entering the Oxidizer

Fuel Type: Natural Gas
Maximum Fuel Firing Rate: 6,333 ft³/hr
Gas Flow Rate: 33,000 scfm
Maximum VOC loading to oxidizer: 197.0 lb/hr of ethanol

Secondary Control: Wolverine Model C-33000 Catalytic Oxidizer (**Oxidizer A**)

Capture Efficiency: \geq 95% of total bakery VOC emissions
Destruction Efficiency: \geq 95% of VOC emissions entering the Oxidizer

Fuel Type: Natural Gas
Maximum Fuel Firing Rate: 6,000 ft³/hr
Gas Flow Rate: 33,000 scfm
Maximum VOC loading to oxidizer: 173.7 lb/hr of ethanol
Minimum oxidizer inlet temperature: 750 °F
Type of Catalyst: Precious Metal Monolith or equivalent

Max. combined hours of operation for both oxidizers: 8,760 hrs/yr

The change in temperature across the oxidizer must be positive during operation.

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PART I. PROCESS DESCRIPTION, continued

D. Stack Parameters (common stack downstream of the oxidizers exit)

Minimum Stack Height: 54 ft
Minimum Distance to Nearest Property Line: 350 ft
Other equipment vented to this stack: bread line #2,
roll line #1 & dehydrating oven

PART II. OPERATIONS AND MAINTENANCE REQUIREMENTS (O&M Plan)

- A. The Permittee shall operate all equipment specified in this permit in accordance with the manufacturer's specifications and recommendations as applicable to the commercial bread baking industry.
- B. The Permittee shall document and implement an O&M Plan for the oxidizers. Oxidizer A and oxidizer B shall have different O&M Plans. Both plans shall be submitted for review and approval within 30 days of issuance of this permit to: Director of Compliance and Field Operations, Bureau of Air Management, 79 Elm Street, 5th Floor, Hartford, Connecticut 06106-5127. Such Plans shall include, but not be limited to, schedules and procedures for the following:
1. maintenance tune-ups of the oxidizer, leak detection and repair,
 2. a procedure to start-up the secondary oxidizer in the event of a shutdown of the primary oxidizer due to malfunction or repair,
 3. burner cleaning and/or maintenance,
 4. catalyst cleaning and/or replacement, and
 5. cleaning and maintenance of any particulate control measures utilized prior to introducing the gas stream to the catalyst media.

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PART II. OPERATIONS AND MAINTENANCE REQUIREMENTS (O&M Plan), cont.

Such plans shall be maintained at the premises and made available to the Commissioner or his agent upon request.

PART III. EMISSION LIMITS

A. Criteria Pollutants

The Permittee shall not allow the combined emissions from the bakery bread line #1 oven, bread line #2 oven, roll line #1 oven, dehydrating oven and any of the two oxidizers to exceed the following:

<u>Pollutant</u>	<u>lb/hr</u>	<u>TPY</u>
PM		1.26
SOx		0.10
NOx		16.68
VOC ⁽¹⁾	12.42	49.00
VOC ⁽²⁾	17.47	
CO		14.01

- (1) MEGTEC Regenerative Thermal Oxidizer (oxidizer B) with 98% destruction efficiency.
- (2) Wolverine Catalytic Oxidizer (oxidizer A) with 95% destruction efficiency.

Note: The basis for annual emission calculations are the design rated capacity of the equipment specified, operation of the equipment according to PART I (B) - Equipment Design Specification during any period of 12 consecutive months and emission factors from:

$$\text{VOC E.F.} = ((0.95Y1 + 0.195Y2 + 0.95Y3 + 0.195Y4 + 1.90)(Y5)(Y6))$$

<Equation 1>

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PART III. EMISSION LIMITS, continued

where:

VOC E.F. = VOC emission factor, pounds VOC per ton baked bread
Y1 = Baker % yeast brew
Y2 = Brew mix & fermentation & proof time (hrs)
Y3 = Baker % yeast dough
Y4 = Dough mix & fermentation & proof time (hrs)
Y5 = 1 ton
Y6 = (1 ton/2,000 lbs)

Equation 1 was derived from AP-42, Section 9.9.6 (2/97). The processes at Pepperidge Farm, Incorporated do not use the spike factors.

Combustion Emissions for dehydrator, bread line #1 oven, bread line #2 oven, roll line #1 oven and oxidizer per AP-42, Section 1.4 (7/98):

MEGTEC Regenerative Thermal Oxidizer (oxidizer B) & Wolverine Catalytic Oxidizer (oxidizer A)

VOC	5.5 lbs/MMft ³
NOx	100 lbs/MMft ³
TSP/PM10	7.6 lbs/MMft ³
CO	84 lbs/MMft ³
SOx	0.6 lbs/MMft ³

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PART III. EMISSION LIMITS, continued

The Permittee shall use the following equation when calculating VOC emissions (VOC controlled as a function of VOC uncontrolled, destruction and capture efficiency):

$$\text{VOC con} = \text{VOC uncon} (1 - (\eta \text{ destruction} \times \eta \text{ capture}))$$

Where:

VOC con = VOC controlled
VOC uncon = VOC uncontrolled

Oxidizer A: *Wolverine Model C-33000 Catalytic Oxidizer*

η destruction = destruction efficiency = 0.95

η capture = capture efficiency = 0.95

Oxidizer B: *MEGTEC Clean Switch Model 350-95 Regenerative Thermal Oxidizer*

η destruction = destruction efficiency = 0.98

η capture = capture efficiency = 0.95

The above statement shall not preclude the Commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

B. Hazardous Air Pollutants:

The Permittee shall not allow emissions of **Ethanol**, and **Acetaldehyde** from the bread line and two (2) oxidizers to exceed the Maximum Allowable Stack Concentration (MASC) as determined pursuant to the provisions of RCSA § 22a-174-29 and Equation 2:

$$\text{MASC } (\mu\text{g}/\text{m}^3) = \frac{0.885 * (\text{HLV}) * [\text{X} + 1.08 * \text{V}^{.64}]^{1.56}}{\text{V}} \quad \text{<Equation 2>}$$

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PART III. EMISSION LIMITS, continued

Where:

HLV= Hazard Limiting Value for each specific HAP emitted from the operation of the dehydrating oven and the oxidizers ($\mu\text{g}/\text{m}^3$)

V= The exhaust gas flowrate exiting the stack (actual m^3/second)

X= The distance from the stack to the nearest property line (meters)

Adjustment to the MASC for sources that emit continuously for a period of more than 30 minutes but less than eight hours shall be made by multiplying the MASC determine using Equation 2 by the following factor:

Adjustment Factor: $5-4((T-0.5)/7.5)$

Where

T = Number of hours the source is in continuous operation

Should information become available which indicates the presence of other Hazardous Air Pollutants listed in Tables 29-1, 29-2, 29-3 of the RCSA § 22a-174-29 in the exhaust gas stream leaving the bakery dehydrating oven, bread line #1 and bread line #2, roll line, and two oxidizers, the Permittee shall demonstrate compliance for such pollutants.

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PART III. EMISSION LIMITS, continued

Nothing in Part III shall preclude the Commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with RCSA § 22a-174-29, as allowed by state or federal statute, law, or regulation.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

- A. The Permittee shall install and operate a nonresettable timing device on each oxidizer. The Permittee shall monitor and record the monthly and annual operating hours of each oxidizer. Such records shall include the start and end dates of the monthly and annual recording periods and total hours of operation for each oxidizer during the recording period. Annual operating hours shall be based on any consecutive 12 months time period and shall be determined by adding the current month's operating hours to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.
- B. The Permittee shall install and operate thermocouples to continuously monitor and record the inlet temperature to the oxidizer and the operating temperature of the catalyst media.
- C. The Permittee shall maintain a catalogue of recipes for all products baked at the premises. Such catalogue shall include the name of the recipe and the uncontrolled rate of VOC emissions, in units of pounds per ton, estimated from the processing of the specified recipe.
- D. The Permittee shall maintain records of daily and monthly production activity for all the sources connected to the oxidizer system. Such records shall include the start and end dates of the recording period, **identify the oxidizer that was in use**, and the total amount of each recipe baked in these sources during the recording period.

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont.

- E. The Permittee shall clearly identify any occurrence of shutdown/switching of any of the oxidizers in the operating logs, noting the total time that the operation was run without controls before the start-up of any of the oxidizers. Emission calculations shall be adjusted to account for the time the operation was run without any of the oxidizers.
- F. The Permittee shall calculate and record the monthly and annual controlled and uncontrolled emissions of VOC from the sources specified in this permit. Annual emissions shall be based on any consecutive 12 month time period and shall be determined by adding the current month's emissions to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.
- G. The Permittee shall maintain a process diagram of the entire capture system that includes all sources of VOC emissions; emissions capture points, and associated ductwork. Such diagram shall be updated to accurately reflect any alterations to the capture system. All diagrams shall bear the date on which the diagram was created.
- H. The Permittee shall make and keep records on the premises to determine compliance with the terms and conditions of this permit in accordance with RCSA § 22a-174-4. Such records shall be made available upon request by the Commissioner and kept for the duration of this permit or for the previous five years, whichever is less.

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PART V. STACK TESTING REQUIREMENTS AND SPECIAL REQUIREMENTS

- A. The Permittee shall stack test the MEGTEC Regenerative Thermal oxidizer (oxidizer B) and the Wolverine catalytic oxidizer (oxidizer A) every three years from the date of the last stack testing.
- B. The initial starting test date for oxidizer A and oxidizer B shall be May 17, 2006 (the most recent test date). The next stack testing shall be performed on or before May 17, 2009 unless the roll line has been re-configured to bread production as allowed in this permit. Then the stack testing shall be performed within 180 days of initial start-up as a roll/bread line. All testing shall be performed with all four lines operating at maximum rated capacity for both oxidizers.
- C. The Permittee shall submit an Intent to Test (ITT) form and a testing protocol detailing the performance of stack emissions testing to determine the VOC capture and destruction efficiencies of both oxidizers authorized to operate under this permit. The test protocol shall be consistent with the Bureau's Emission Source Test Guideline specifying the test methodology to be followed and the conditions under which the process and its control equipment will be operated. The process shall be operated at a minimum of 90% of the permitted maximum rated capacity and the control equipment shall be operated as specified in this permit.
- D. All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the Bureau. The ITT package must demonstrate compliance with applicable requirements of the Code of Federal Regulations (CFR) Title 40 Parts 51, 60 and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the Bureau prior to stack testing. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with

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the ITT package to the Air Bureau's Stack Test Group for approval prior to stack testing. Please submit an original and one copy of the ITT package to: Director of Compliance and Field Operations, Bureau of Air Management, 79 Elm Street, 5th Floor, Hartford, Connecticut 06106.

- E.** An inspection of the source may be conducted to verify that appropriate instrumentation is available for the purposes of determining VOC capture and destruction efficiencies of both oxidizers, and to determine the source process parameters, indicative of compliant operation, to be monitored during stack testing. Once the ITT package is approved, the owner/operator shall be notified, in writing, by the Bureau's Stack Test Group.
- F.** The source test must be scheduled, monitored by Bureau personnel, and completed no later than 60 days from the date of Commissioner's approval of the proposed ITT package. It is the source's responsibility to conduct preparatory testing for tuning or debugging purposes prior to the Bureau-monitored stack testing. During testing, the baking ovens, dehydrator, and oxidizers shall be operated as limited by applicable standard, statute, regulation, permit, or order; in accordance with the operating conditions specified in the testing protocol that was submitted as required by this permit and approved by the Commissioner. A complete test report shall be submitted to the Bureau within 45 days of the completion of emissions testing. The test report shall also include a tabular or empirical analysis relating the observed capture and destruction efficiencies and the corresponding observed temperature differences, to the recipes and/or combinations of equipment operation represented by the conditions of the test. The Permittee shall respond to any test report deficiency within 15 days of notification by the Bureau.

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PART V. STACK TESTING REQUIREMENTS AND SPECIAL REQUIREMENTS, cont.

- G. Thereafter, the Permittee shall submit an ITT form at least 90 days prior to the third anniversary date of the last approved test for the Wolverine Catalytic Oxidizer (oxidizer A) and for the MEGTEC Regenerative Thermal Oxidizer (oxidizer B).

PART VI. CONTROL EQUIPMENT MALFUNCTION

- A. Equipment or methods which control air pollutant emissions from a stationary source and which are necessary to the operation of such stationary source in compliance with applicable emission standards and regulations shall be maintained in operation at all times that the stationary source is in operation or emitting air pollutants. This includes instruments required by permit, order, or regulation which measure those source operating parameters which affect air pollutant emissions, air pollution control equipment, or other instruments which measure meteorological data required by permit, order or regulation.
- B. Notwithstanding the above, the Permittee may deliberately shut down any such control equipment, method, or other instruments specified in RCSA § 22a-174-7(a) while the source is in operation only for such necessary maintenance as cannot be accomplished when the stationary source itself is not in operation and is not emitting air pollutants. In the event of breakdown, failure, or deliberate shut down of any control equipment, method, or other instrument specified in RCSA § 22a-174-7(a) during which time the stationary source will be in operation, all reasonable measures shall be taken to assure resumption of the control equipment as soon as possible. Due diligence shall be exercised to minimize emissions while the control equipment or method is inoperative. In the event such shutdown of control equipment or methods is expected or may reasonably be expected to continue for longer than 24 hours, and if the source is to be operated at any time during that period, the Commissioner shall be notified promptly. Such notice shall include, but is not limited to, the following:

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PART VI. CONTROL EQUIPMENT MALFUNCTION, continued

1. Identification of the specific equipment or instrument taken out, or to be taken out, of service as well as its location, and, where applicable, registration or permit number;
2. The expected length of time that the air pollution control equipment or instrument will be out of service;
3. The nature and quantity of emissions of air pollutants likely to be emitted during the shutdown period;
4. Measures such as the use of offshift labor and equipment that will be taken to minimize the length of the shutdown period; and
5. The reasons that it would be impossible or impractical to shut down the stationary source operation during the maintenance Period.

The Commissioner may attach conditions to the operation of the source during the period of shutdown or breakdown.

PART VII. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.

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PART VII. ADDITIONAL TERMS AND CONDITIONS, continued

- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D. This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons of municipalities who are not parties to this permit.
- E. Any document, including any notice, which is required to be submitted to the Commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in the documents and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense." Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense in accordance with Connecticut General Statutes §22a-6, under §53a-157 of the Connecticut General Statutes.

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PART VII. ADDITIONAL TERMS AND CONDITIONS, continued

- F. Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the Commissioner.
- G. Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the Commissioner.
- H. The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- I. Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of the Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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